

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. CR18-236 RSL

v.

~~(PROPOSED)~~  
PROTECTIVE ORDER

BABAK REZAPOUR,

Defendant.

This matter having come before the Court on a Stipulated Motion for Entry of a  
Discovery Protective Order, the Court hereby enters the following:

**DISCOVERY PROTECTIVE ORDER**

**A. Definitions**

As used in this Order, the term "Protected Information" means any date of birth,  
Social Security number, driver's license number, bank account number, credit card  
number, personal identification number, address, telephone number, name and/or location  
of employment, criminal history record, background check, victim identity, and/or any  
other similar information or number implicating a privacy interest of and belonging to an  
individual, business, partnership, or corporation.

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UNITED STATES ATTORNEY  
700 STEWART ST., SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 As used in this Order, the term "Protected Material" means any document or other  
2 record containing or reflecting Protected Information.

3 **B. Permissible Disclosure of Protected Information and Protected Material**

4 The United States will make available copies of the Protected Material to defense  
5 counsel to comply with the government's discovery obligations. Possession of the  
6 Protected Material is limited to defense counsel, her investigators, paralegals, assistants,  
7 law clerks, and experts ("members of the defense team").

8 Members of the defense team may not provide copies of the Protected Material to  
9 other persons, including the Defendant himself. Members of the defense team may  
10 review Protected Information and/or Protected Material with the Defendant. The  
11 Defendant may visually inspect and review such documents but shall not be allowed to  
12 possess Protected Information (such as unredacted copies of Protected Material, notes,  
13 copies, or photographs of such Protected Material containing Protected Information).  
14 The Defendant may possess documents from which all Protected Information has been  
15 redacted.

16 Members of the defense team may review or discuss the contents of documents  
17 containing Protected Material with any prospective witness, as long as they do not share  
18 the unredacted documents, or share any Protected Information with any prospective  
19 witness.

20 **C. Filing**

21 If any Protected Information or Protected Material is filed in court or otherwise  
22 disseminated as part of litigation, the parties shall redact such information prior to filing;  
23 unless, based on a party's application prior to filing, the Court finds that an unredacted  
24 filing is necessary and appropriate.

25 **D. Maintenance**

26 Members of the defense team shall keep any Protected Material secured whenever  
27 the Protected Material is not being used in furtherance of their work in the above-  
28 captioned case.

1 All documents containing Protected Material shall be returned to the  
2 United States, or destroyed, once all charges are resolved by dismissal or by final  
3 conviction. The provisions of this Order shall not terminate at the conclusion of this  
4 prosecution.

5 **E. Modification**

6 The parties agree that this Protective Order may be modified, as necessary, by  
7 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order  
8 of the Court.

9 DATED this 24<sup>th</sup> day of October, 2018.

10  
11  
12  
13 Robert S. Lasnik  
14 ROBERT S. LASNIK  
15 United States District Court Judge

16 Presented by:

17  
18 /s/ Marie Dalton  
19 MARIE M. DALTON  
20 Assistant United States Attorney